

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

STEVE BLUMFELDER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:22-cv-00999
	)	
CHUBB INSURANCE SOLUTIONS	)	
AGENCY, INC.	)	
	)	
Defendant.	)	

**DISCLOSURE OF ORGANIZATIONAL INTERESTS CERTIFICATE**

COMES NOW Defendant ACE American Insurance Company (incorrectly named as “CHUBB Insurance Solutions Agency, Inc.”), pursuant to Local Rule 2.09 and Federal Rule of Civil Procedure 7.1, and by and through its counsel discloses that:

- Neither ACE American Insurance Company (incorrectly named as CHUBB Insurance Solutions Agency, Inc) nor CHUBB Insurance Solutions Agency Inc. are publicly traded.
- ACE American Insurance Company is a wholly owned subsidiary of INA Holdings Corporation, which is a wholly owned subsidiary of INA Financial Corporation. INA Financial Corporation is a wholly owned subsidiary of INA Corporation, which is a wholly owned subsidiary of Chubb INA Holdings Inc. Chubb INA Holdings Inc. is owned 80% by Chubb Group Holdings Inc. and 20% by Chubb Limited. Chubb Group Holdings Inc. is a wholly owned subsidiary of Chubb Limited. Chubb Limited is a Swiss company publicly traded on the New York Stock Exchange (NYSE: CB). No company or individual owns 10% or more of Chubb Limited stock.
- Chubb Insurance Solutions Agency Inc. is a wholly owned subsidiary of Chubb & Son Inc., which is a wholly owned subsidiary of INA Holdings Corporation. INA Holdings

Corporation is a wholly owned subsidiary of INA Financial Corporation, which is a wholly owned subsidiary of INA Corporation. INA Corporation is a wholly owned subsidiary of Chubb INA Holdings Inc. Chubb INA Holdings Inc. is owned 80% by Chubb Group Holdings Inc. and 20% by Chubb Limited. Chubb Group Holdings Inc. is a wholly owned subsidiary of Chubb Limited. Chubb Limited is a Swiss company publicly traded on the New York Stock Exchange (NYSE: CB). No company or individual owns 10% or more of Chubb Limited stock.

- Neither ACE American Insurance Company, nor Chubb Insurance Solutions Agency Inc. have subsidiaries not wholly owned by them.

By signing this disclosure of organizational interests certificate, counsel acknowledges that “if any required information changes,” counsel must file an amended certificate within seven (7) days of the change. E.D.Mo. L.R. 2.09(C); see also Fed. R. Civ. P. 7.1(b)(2).

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

/s/ Sean J. Oliveira

Eric A. Todd, # 46919MO

Sean J. Oliveira, # 72056MO

7700 Bonhomme Avenue, Suite 650

St. Louis MO, 63105

Telephone: 314.802.3935

Facsimile: 314.802.3960

eric.todd@ogletree.com

sean.oliveira@ogletree.com

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 27, 2022, I electronically filed the above and foregoing document using the Court's e-filing system and sent a copy via U.S. Mail to:

Joseph A. Ott  
Mark E. Blankenship, Jr.  
Ott Law Firm  
3544 Oxford Blvd.  
Maplewood, MO 63143  
Phone: 314-293-3756  
Fax: 314-689-0080

*Attorneys for Plaintiff*

/s/ Sean J. Oliveira  
An Attorney for Defendant